

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

MICHAEL GAFFNEY,

Plaintiff,

v.

MUHAMMAD ALI ENTERPRISES LLC, a  
New York Limited Liability Company;  
AUTHENTIC BRANDS GROUP LLC, a New  
York Limited Liability Company; ROOTS OF,  
INC., a California corporation d/b/a “ROOTS  
OF FIGHT;” and DOES 1-10,

Defendants.

Civil Action No. 1:18-CV-08770-GBD-OTW

Civil Action No. 1:20-CV-07113-GBD-OTW

**DECLARATION OF JASON C. LINGER, ESQ. IN SUPPORT OF PLAINTIFF  
MICHAEL GAFFNEY’S OPPOSITION AND RESPONSE TO DEFENDANTS’ MOTION  
*IN LIMINE* NO. 4 TO PRECLUDE PLAINTIFF FROM INTRODUCING ANY  
EVIDENCE OR ARGUMENT ABOUT ALLEGED DAMAGES BASED ON REVENUE  
OR PROFIT GENERATED BY THE MUHAMMAD ALI ENTITIES**

I, Jason C. Linger, Esq, am an associate in the law firm of Glaser Weil Fink Howard Jordan & Shapiro LLP, which represents Plaintiff Michael Gaffney (“Gaffney”) in this action. I submit this declaration in support of Gaffney’s Opposition to Defendants’ Motion *In Limine* No. 4 to preclude Plaintiff from introducing any evidence or argument about alleged damages based on revenue or profit generated by the Muhammad Ali Entities.

1. Attached hereto as **Exhibit 1** is a true and correct copy of Plaintiff’s First Set of Requests for Production, dated May 4, 2020 (“5/4/2020 Plaintiff’s RFPs”).

2. Attached hereto as **Exhibit 2** is a true and correct copy of relevant portions of the Transcript of the Court’s September 30, 2020 Hearing (“9/30/2020 Hearing Tr.”)

3. Attached hereto as **Exhibit 3** is a true and correct copy of relevant portions of Defendants Muhammad Ali Enterprises LLC And Authentic Brands Group LLC’s Supplemental Responses And Objections To Plaintiff’s Requests For Production Of Documents Dated May 4, 2020 [First Set], dated November 17, 2020 (“11/17/20 Supplemental Response.”).

4. Attached hereto as **Exhibit 4** is a true and correct copy of relevant portions of the Transcript of the Adam Kronengold Deposition held on February 23, 2021 (“2/23/21 Kronengold Tr.”).

5. Attached hereto as **Exhibit 5** is a true and correct copy of Exhibit N to the Preliminary Expert Report of Professor Jeffrey Sedlik (“Ex. N”) (relevant portions).

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 12<sup>th</sup> day of January, 2024 at Los Angeles, California.

By: /s/ Jason C. Linger  
Jason C. Linger

**CERTIFICATE OF SERVICE**

I hereby certify that on January 12, 2024, a true and correct copy of the foregoing **DECLARATION OF JASON C. LINGER, ESQ. IN SUPPORT OF PLAINTIFF MICHAEL GAFFNEY'S OPPOSITION AND RESPONSE TO DEFENDANTS' MOTION IN LIMINE NO. 4 TO PRECLUDE PLAINTIFF FROM INTRODUCING ANY EVIDENCE OR ARGUMENT ABOUT ALLEGED DAMAGES BASED ON REVENUE OR PROFIT GENERATED BY THE MUHAMMAD ALI ENTITIES** was filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Robert E. Allen

Robert E. Allen